

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2012-9-E

In the Matter of:)	
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South Carolina Electric & Gas)	PETITION TO INTERVENE
Company's Integrated Resource)	
Plan (IRP))	
)	

The South Carolina Coastal Conservation League (“CCL”), Southern Alliance for Clean Energy (“SACE”), and Upstate Forever (collectively, “Petitioners”) hereby petition the South Carolina Public Service Commission (“Commission”), pursuant to R. 103-825 of the Commission’s rules, to intervene in the above-captioned docket. In support of this petition, Petitioners state as follows:

1. South Carolina Electric and Gas Company (“SCE&G”) is an investor-owned utility that is regulated by the Commission. S.C. Code Ann. § 58-3-140 (2010). The Commission regulates and supervises SCE&G as to, among other things, its rates, services, and facilities. R. 103-810 of S.C. Code of Regs. (citing S. C. Code Ann., §§ 58-27-10 *et seq.*). SCE&G’s rates, services and facilities are relevant to, and in part a function of, the development of its integrated resource plan (“IRP”).

2. SCE&G must prepare IRPs, submit them to the State Energy Office every three years and update them on an annual basis, and file the plans with the Commission pursuant to the requirements established by the Commission. S.C. Code Ann. § 58-37-40 (2010).

3. IRP filings in the Commission must contain a 15-year demand and energy forecast; the utility's program for meeting its forecast requirements in an economic and reliable manner, including both demand-side and supply-side options; a brief description and summary of cost-benefit analysis, if available, of each option considered, including those not selected; and the supplier's or producer's assumptions and conclusions with respect to the plan's effect on the cost and reliability of energy service, and a description of the external, environmental and economic consequences of the plan to the extent practicable. Commission Order No. 1998-502; *see also* S.C. Code Ann. § 58-37-10 (2010).

4. In Order No. 2012-26, issued February 1, 2012 in Docket No. 2011-9-E, the Commission set February 28, 2012 as the deadline for SCE&G to file its 2012 IRP. SCE&G filed a letter in the above-captioned docket on February 15, 2012 requesting a 60-day extension until April 30, 2012 to file its IRP. The Commission granted this request in Order No. 2012-153, issued February 22, 2012. On April 18, 2012, SCE&G filed a request for a further 30-day extension until May 30, 2012, which was granted by the Hearing Officer by directive issued April 19, 2012.

5. In Order No. 2012-26, the Commission declared that "the Commission's integrated resource planning process [constitutes] a proceeding under Section 103-804(Q) of our regulations, into which intervention is permitted." In rendering this decision, the Commission noted that "[t]he IRP process is an important planning tool for the Companies and the Commission," and that "a transparent and open process in this regard allows for increased sharing of information and ideas, which is valuable to all interested

parties.” Commission Order No. 2012-26. The Commission indicated that in future IRP dockets, intervention requests would be considered by the Commission.

6. Petitioners seek to intervene in this docket to advocate for integrated resource planning that evaluates resource alternatives and results in a low-cost, reliable portfolio of supply- and demand-side resources with minimal harmful environmental impacts and costs to ratepayers.

7. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from SCE&G and who would be subject to the impacts of SCE&G’s integrated resource planning, which influences decision-making about supply- and demand-side resources.

8. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina. SACE and its members are interested in promoting greater reliance on clean, low-cost energy and have an interest in SCE&G’s IRP. SACE has members in South Carolina who receive electricity service from SCE&G and who would be subject to the impacts of SCE&G’s integrated resource planning.

9. Upstate Forever is a non-profit, membership-based organization existing under the laws of the State of South Carolina. The principal address of Upstate Forever

is 507 Pettigru Street, Greenville, South Carolina 29601. Upstate Forever promotes sensible growth and the protection of special places in the Upstate region of South Carolina, including Abbeville, Anderson, Cherokee, Greenville, Greenwood, Laurens, Oconee, Pickens, Spartanburg, and Union counties. The Upstate region includes a portion of SCE&G's service territory. Upstate Forever has members that receive electrical service from SCE&G and are subject to the impacts of the utility's resource planning process and subsequent decision-making.

10. The provision of reliable and economic energy, and all decisions related thereto, including the mix of resources selected, impacts Petitioners and their members. Accordingly, Petitioners and their members have an interest in this proceeding. As intervenors, Petitioners would advance this interest by filing comments, requesting an evidentiary hearing and/or an allowable ex parte briefing, and participating in any such proceeding by providing relevant information and comments based on expert review of SCE&G's IRP.

11. Petitioners are represented by the following counsel in this proceeding:

J. Blanding Holman, IV
Southern Environmental Law Center
43 Broad St. – Suite 300
Charleston, SC 29401
Telephone: (843) 720-5270
Fax: (843) 720-5240
bholman@selcsc.org

WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 25th day of May, 2012.

s/ J. Blanding Holman, IV
SC Bar No. 72260
Southern Environmental Law Center
43 Broad St. – Suite 300
Charleston, SC 29401
Telephone: (843) 720-5270
Fax: (843) 720-5240

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

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In the Matter of:)	
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South Carolina Electric & Gas)	CERTIFICATE OF SERVICE
Company's Integrated Resource)	
Plan (IRP))	
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I certify that the persons on the service list have been served with the foregoing Petition to Intervene of the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, and Upstate Forever either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

Florence Belser
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
fbelser@regstaff.sc.gov

K. Chad Burgess
South Carolina Electric and Gas
220 Operation Way – MC C222
Cayce, SC 29033-3701
Chad.burgess@scana.com

Matthew Gissendanner
South Carolina Electric & Gas Company
220 Operation Way – MC C222
Cayce, SC 29033-3701
Matthew.gissendanner@scana.com

This the 25th day of May, 2012

/s/ Robin G. Dunn